

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KENNETH CREIGHTON,

Plaintiff, **NOTICE OF MOTION FOR
MOTIONS *IN LIMINE***

-against-

1:12-cv-07454-PGG-DCF

THE CITY OF NEW YORK, DETECTIVE DEAN
ROBERTS (Shield No. 05861), DETECTIVE GLENN
GODINO (Shield No. 2756), POLICE OFFICERS JOHN
DOES 1-10 (names being fictitious and presently unknown
and intended to be employees of the NYPD who were
involved in Plaintiff's arrest, detention, imprisonment,
and/or prosecution), DISTRICT ATTORNEY ROBERT T.
JOHNSON, ASSISTANT DISTRICT ATTORNEY
BRUCE BIRNS A/K/A BURNS, ASSISTANT DISTRICT
ATTORNEY ED TALTY a/k/a ED TULTY and
ASSISTANT DISTRICT ATTORNEY MICHAEL
COOPER,

Defendants.

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PLEASE TAKE NOTICE that upon the annexed Declaration of Kevin Thadani, dated August 1, 2016, and the exhibits annexed thereto; the accompanying Memorandum of Law in Support of Defendants' Motions *In Limine*; and all prior pleadings and proceedings had herein, defendants will move this Court, before the Honorable Paul G. Gardephe, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York 10007, for an order granting defendants' motions *in limine*, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, by Order of the Court, opposition papers, if any, shall be served on or before August 8, 2016.

Dated: New York, New York
August 1, 2016

ZACHARY W. CARTER
Corporation Counsel of the City of New York
Attorney for Defendants
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New York, New York 10007
(212) 356-2351

By: /s/ Gavin Thadani
Gavin Thadani
Senior Counsel
Special Federal Litigation Division

TO: **VIA ECF**
Richard Gross, Esq.
Michael Jaffe, Esq.
Attorneys for Plaintiff